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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL EXHIBITS IN  
SUPPORT OF OPPOSITION TO UBER  
AND OTTOMOTTO'S MOTION TO  
ENFORCE THE COURT'S JUNE 7, 2017  
ORDER, STRIKE WAYMO'S  
SUPPLEMENTAL INITIAL DISCLOSURE,  
AND PRECLUDE DAMAGES CLAIMS  
AND CERTAIN WITNESSES**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make declaration in support of Waymo’s Administrative Motion to File Under Seal  
7 Portions of Exhibits in Support of Its Opposition to Uber and Ottomotto’s Motion to Enforce the  
8 Court’s June 7, 2017 Order, Strike Waymo’s Supplemental Initial Disclosure, and Preclude Damages  
9 Claims and Certain Witnesses (the “Administrative Motion”). The Administrative Motion seeks an  
10 order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 6 to the Declaration of Lindsay Cooper	Highlighted Portions	Waymo (green highlighting); Uber <sup>1</sup> (blue highlighting)
Exhibit 7 to the Declaration of Lindsay Cooper	Green Highlighted Portions	Waymo

16 3. Specifically, Exhibits 6 and 7 (portions highlighted in green) contain or refer to trade  
17 secret and confidential business information, which Waymo seeks to seal.

18 4. Exhibits 6 and 7 (portions highlighted in green) each contain, reference, and/or  
19 describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the  
20 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, which  
21 Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo  
22 (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public  
23 disclosure of this information would give Waymo’s competitors access to in-depth descriptions—and  
24 analysis—of the functionality of Waymo’s autonomous vehicle system. Exhibits 6 and 7 (portions  
25 highlighted in green) also refer to the time and cost Waymo dedicate to developing each of its trade  
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27 <sup>1</sup> “Uber” means Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC, collectively.  
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1 secrets. If such information were made public, I understand that Waymo's competitive standing  
2 would be significantly harmed.

3 5. Waymo's request to seal is narrowly tailored to those portions of Exhibits 6 and 7  
4 (portions highlighted in green) that merit sealing.

5  
6 I declare under penalty of perjury under the laws of the State of California and the United  
7 States of America that the foregoing is true and correct, and that this declaration was executed in San  
8 Francisco, California, on July 17, 2017.

9 By /s/ Lindsay Cooper

10 Lindsay Cooper

11 Attorneys for WAYMO LLC  
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